

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

FIRST GUARANTY MORTGAGE
CORPORATION, *et al.*¹

Debtors.

Chapter 11

Case No. 22-10584 (CTG)

(Jointly Administered)

Ref. Docket No. 184

**NOTICE OF FILING OF PROPOSED ORDER CONFIRMING APPLICABILITY OF 11
U.S.C. § 559 AND, IN THE ALTERNATIVE, GRANTING RELIEF FROM THE
AUTOMATIC STAY AND RELATED RELIEF**

PLEASE TAKE NOTICE that, on July 21, 2022 Customers Bank filed the *Motion Seeking Confirmation Of Applicability Of 11 U.S.C. § 559 Or, In The Alternative, Granting Relief From The Automatic Stay And Related Relief* (the “Motion”)² [Dkt. 184] (the “Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”).

PLEASE TAKE FURTHER NOTICE that a hearing to consider approval of the Motion on a final basis is scheduled for August 2, 2022 at 10:00 a.m. (Eastern Time) (the “Hearing”).

PLEASE TAKE FURTHER NOTICE that a revised proposed form of order granting the Motion on a final basis (the “Proposed Final Order”) is attached hereto as **Exhibit A**.

PLEASE TAKE FURTHER NOTICE that attached hereto as **Exhibit B** is a comparison of the Proposed Final Order to the Proposed Order filed with the Motion.

PLEASE TAKE FURTHER NOTICE that this Proposed Final Order and prior draft

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax -identification number, are: First Guaranty Mortgage Corporation (9575); and Maverick II Holdings, LLC (5621). The Debtors’ mailing address is 5800 Tennyson Parkway, Suite 450, Plano, TX 75024.

² Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Motion.

versions have been circulated for comment to counsels for the Debtors, Cash Flow DIP Lenders, Fannie Mae, Freddie Mac, Ginnie Mae, Unsecured Creditors Committee, Rushmore Loan Services Management LLC, Deutsche Bank, and the United States Trustee. The undersigned has received and incorporated comments from some of the foregoing parties. The undersigned believes that the attached version will be presented on a substantially, if not fully, consensual basis.

PLEASE TAKE FURTHER NOTICE that Customers Bank reserves the right to modify the Proposed Final Order prior to the Hearing.

Dated: August 2, 2022

/s/ Eric Lopez Schnabel
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